

Benjamin Davidson, Esq. – State Bar No. 241859
Email: bdavidson@bendavidsonlaw.com
LAW OFFICES OF BENJAMIN DAVIDSON, P.C.
8383 Wilshire Boulevard, Suite 800
Beverly Hills, CA 90211
Telephone: (323) 456-8647
Facsimile: (310) 432-0104

[List of Counsel/Parties Continued on Next Page]

ARTEC GROUP, INC., a California Corporation,)	Case No. 15-cv-03449-EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER RE: EXTENSION OF CASE
vs.)	DEADLINES DUE TO SETTLEMENT
)	[L.R. 6-1(b), 6-2]
ANDREY KLIMOV, an individual, et al.,)	Judge: Honorable Edward M. Chen
)	
Defendants.)	Trial Date: February 20, 2018
)	
)	Action Filed: July 27, 2015

1 [List of Counsel/Parties Continued]

2 Mr. Andrey Klimov
3 Prospect Vernadskogo, 25, 1, 40
4 Moscow, Russia, 119331
5 klivan117@gmail.com
6 916-251-8233
7 Defendant *in pro per*

8 Ms. Anna Stebleva
9 Vesennyaya Street, 25, 2, 21
10 Moscow, Russia, 125635
11 stebleva@gmail.com
12 791-644-4259
13 Defendant *in pro per*

1 Pursuant to the United States District Court, Northern District of California Local
2 Rules, Rules 6-1(b) and 6-2, Louise Ann Fernandez, attorney for plaintiff Artec Group,
3 Inc. (“Artec” or “Plaintiff”), and defendants Andrey Klimov and Anna Stebleva
4 (“Defendants”), *in pro per*, state and stipulate as follows:

5 1. Pursuant to the parties’ stipulation and the Court's July 27, 2017 Order (the
6 “Order”) (Dkt. 289), the following case deadlines were set: (a) deadline for the exchange
7 of opening expert reports on September 28, 2017, the deadline for the exchange of
8 rebuttal expert reports on October 12, 2017, the expert discovery cutoff on October 26,
9 2017, and the last day for the hearing of dispositive motions on November 30, 2017.

10 2. Artec and Mr. Klimov participated in a court-ordered settlement conference
11 on August 11, 2017, and reached a settlement of the matters between them. The terms of
12 the settlement were read into the record by the parties. (Dkt. 313). Although settlement
13 has been reached with Mr. Klimov, there are agreed terms requiring performance of certain
14 actions by Mr. Klimov and Artec, which the parties are in the process of completing.
15 However, the parties require additional time to complete these actions, including, for
16 example, finalizing intellectual property assignments and licenses. Artec has agreed to
17 dismiss the action against Mr. Klimov only after performance of all the settlement terms is
18 complete. The parties agree that the Court shall retain jurisdiction to enforce the
19 settlement agreement.

20 3. Neither Ms. Stebleva nor Ms. Klimova appeared at the settlement
21 conference, although they were ordered to appear in person. (Dkt. 280.) However, the
22 settlement includes the provision that: “Artec shall agree to dismiss . . . its case against
23 Anna Stebleva and Yulia Klimova, subject to the confirmation of their acceptance of the
24 previously recited settlement terms. (Dkt. 313, Tr. 8:3-8). Artec has corresponded with
25 Mses. Stebleva and Klimova and they have not yet confirmed their acceptance of the
26 settlement terms, and Ms. Stebleva has indicated that they cannot do so until completion
27 of the further required actions by Mr. Klimov referenced above.

4. In order to give the parties sufficient time to complete the performative terms of the settlement reached on August 11, 2017, the parties request that the Court extend all of the remaining case deadlines except the pretrial conference and trial date by approximately 30 days.

5. Each of these dates or deadlines was previously extended by stipulation and Court Order on July 27, 2017.

THEREFORE, the Parties agree and request the Court to enter an order modifying the case deadlines as follows:

1. The deadline for opening expert reports shall be October 26, 2017;
2. The deadline for rebuttal expert reports shall be November 8, 2017;
3. The expert discovery cutoff shall be November 22, 2017; and
4. The last day dispositive motions may be heard shall be December 21, 2017.

IT IS SO STIPULATED.

Concurrence in the filing of this stipulation has been obtained from each of the other Signatories.

Dated: August 31, 2017 Respectfully submitted,

By: /s/ Louise Ann Fernandez

Louise Ann Fernandez

An Nguyen Ruda

JEFFER MANGELS BUTLER & MITCHELL LLP

Benjamin Davidson

LAW OFFICES OF BENJAMIN DAVIDSON, P.C.

Attorneys for Plaintiff
ARTEC GROUP, INC.

1 Dated: August 31, 2017

Respectfully submitted,

2
3 By: /s/ Andrey Klimov

ANDREY KLIMOV

4 Defendant, *in pro per*

5
6 Dated: August 31, 2017

Respectfully submitted,

7
8 By: /s/ Anna Stebleva

ANNA STEBLEVA

9 Defendant, *in pro per*

10
11
12 **ORDER**

13
14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15
16 Dated: 9/12/17

